

REMARKS

This amendment is submitted in response to the Advisory Action mailed 3/16/04. Claims in their pending forms are also submitted herein. Claims 11-13, 15-17, 19-20, 22-24, 26-28, and 30-31 have been amended for readability.

Examiner stated in response to Applicant's response to Final Office Action dated 2/12/04 that Applicant's response *"does not place the application in condition for allowance because: the arguments are not persuasive since Shima et al.'s nodes are on the IEEE 1394-1995 bus; in the nature of the IEEE 1394-1995 bus, all link devices connected on the bus are identified during initialization or enumeration and corresponding drivers are loaded in order to communicate with the devices."*

1. Applicant asserts that the Examiner has failed to comprehend the nature of the invention, despite it being plainly stated in both the background of the invention of the present application as well as the claims that define the scope of the invention. Specifically, the present invention is directed to detecting a link driver; receiving capabilities of said link driver; generating a link driver configuration for said link driver from said capabilities of said driver; and loading said link driver configuration into said link driver. Examiner's attention is directed to page 2, line 20 – page 3, line 12 of the present application:

"Prior art implementations provide a static link driver which is configured *identically* for each node 2a, 2b without regard for the type of communication that will be carried out by the node. Thus, link driver 5a is configured the same way as 5b, even though node 2a may carry out different communication than node 2b. The prior art implementation of providing a static configuration for link drivers is not always optimal. For example, in IEEE 1394 communication, nodes may carry out asynchronous and isochronous communication. In asynchronous communication such as SPB (serial bus protocol), it would be advantageous to have a link device configured for data pumping to provide optimum performance for such asynchronous transfers. On the other hand, in isochronous communication such as AV/C (audio/video control), no advantage is provided if the link device is configured for transferring isochronous data. Thus, the

current implementation of providing a static configuration link driver for all LINKS (3a, 3b, for example) is a disadvantage.”

Given this problem statement, and Applicant’s previous attempts to explain to the Examiner the differences between link drivers and devices drivers, the Examiner is again respectfully requested to reconsider the claims.

Applicant asserts that the Examiner has mischaracterized the cited prior art by inaccurately equating a link driver to a device driver when link drivers and device drivers are functionally different. A device driver is specific to a device and is not concerned with any hardware-specific details of the link layer. Conversely, a link driver is specific to the processor implementing the link layer and is not concerned with any hardware-specific details of any device.

Applicant respectfully requests Examiner to reconsider the arguments below, which were not substantively addressed in the Advisory Action dated 3/16/04.

A. For the point that Shima does not teach disclose or otherwise suggest detecting a link driver as claimed in claims 10 and 21:

Examiner asserts that “[f]or example in Shima, in order to communicate with the new device, an appropriate driver of the device should be searched, found, or detected and loaded” Applicant respectfully reminds Examiner that the present invention is specifically focused on link drivers and not device drivers. Applicant respectfully requests the Examiner to reconsider Applicant’s claims keeping in mind the differences between a link driver and a device driver.

B. For the point that Shima does not teach disclose or otherwise suggest receiving capabilities of the link driver as claimed in claims 10 and 21:

Examiner asserts that Shima teaches receiving capabilities of the link driver associated with the device by the link driver accessing the configuration ROM of the device in order to generate an object representing the capabilities of the device.

Applicant respectfully asserts that the Examiner has mischaracterized the cited portion in Shima to support this remark. Shima, at column 3, lines 38-42, makes no mention of a link driver, or detecting capabilities of a link driver. Shima, at column 3, lines 38-42 reads:

“During a self-identifying process, after the bus reset, information about the characteristics of the devices within the network is received. From this self-identifying information objects representing the devices are generated.”

Applicant respectfully asserts that this portion of Shima is talking about generating objects that represent devices. Examiner is respectfully requested to reconsider Applicant’s original argument while keeping in mind the difference between device drivers/device objects and link drivers.

C. Shima does not teach disclose or otherwise suggest generating a link driver configuration for the link driver from the capabilities received as claimed in claims 10 and 21.

Examiner asserts that Shima teaches generating a link driver configuration by citing that Shima teaches generating an object representing the device. Again, Applicant respectfully requests Examiner reconsider claims 10 and 21 while keeping in mind the difference between a link driver and a device driver.

D. Shima does not teach disclose or otherwise suggest loading the link driver configuration in the link driver as claimed in claims 10 and 21.

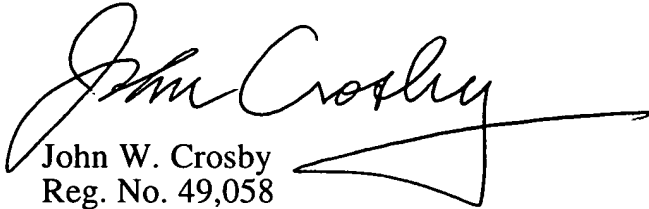
Again, Applicant respectfully requests Examiner reconsider claims 10 and 21 while keeping in mind the difference between a link driver and a device driver.

Invitation to Telephone Conference

The undersigned attorney invites the Examiner to conduct a telephone conference to resolve any issues as the Examiner sees as capable of being resolved through additional discussion.

Respectfully submitted,

SIERRA PATENT GROUP, LTD.


John W. Crosby
Reg. No. 49,058

Dated: April 12, 2004

Sierra Patent Group, Ltd.
PO Box 6149
Stateline, NV 89449
(775) 586-9500